

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

FILED

JUL 22 2015

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY 258 DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

v.

LAWRENCE MADRID,

Defendant.

§
§
§
§
§
§
§
§

NO. EP-15-M-02528-ATB

GOVERNMENT'S MOTION TO SEAL CRIMINAL COMPLAINT

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas, and files this, its Motion to Seal the Criminal Complaint, Affidavit, and Arrest Warrant in the above numbered cause and would show the Court as follows:

I.

On July 22, 2015, the Criminal Complaint, Affidavit, and Arrest Warrant were filed, charging the above named defendant in the above numbered cause. The disclosure of the existence of the Criminal Complaint would seriously jeopardize the ability of law enforcement officers to locate the Defendant and apprehend him without incident. The Government therefore seeks an Order of the Court placing the Criminal Complaint and related documents concerning the above named Defendant in the above numbered cause under seal, until the Defendant is arrested except that a copy of each may be provided to the United States. **When the Defendant is arrested, the Criminal Complaint and related documents will be unsealed.**

Accordingly, the United States respectfully requests that this motion and the Court's Order be sealed until further order of the Court or **until the Defendant is arrested.**

Respectfully submitted,

RICHARD L. DURBIN, JR.
UNITED STATES ATTORNEY

By:

A handwritten signature in black ink, appearing to read "Robert Almonte II", written over a horizontal line.

ROBERT ALMONTE II
Assistant U.S. Attorney
Texas Bar #24049479
700 E. San Antonio, Suite 200
El Paso, Texas 79901
(915) 534-6884